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VIA FACSIMILE MACHINE  
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June 17, 2002

Arthur H. Rosenfeld  
Commissioner and Associate Member  
Energy Efficiency Committee  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

02-045-1  
CALIF ENERGY COMMISSION

JUN 19 2002

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Dear Commissioner Rosenfeld:

The National Electrical Manufacturers Association (NEMA) Luminaire Section wishes to comment on the CEC Outdoor Lighting Standards Proceeding scheduled for discussion on Tuesday, June 18, 2002.

The NEMA Luminaire Section has been actively involved in the CEC Outdoor Lighting Standards Proceeding. The Section has provided a template, testimony and most recently, written and oral comments on the March 27, 2002 workshop. The NEMA Luminaire Section seeks to be a productive participant in the course of the proceeding and work cooperatively with the CEC. In light of this understanding, however, the NEMA Luminaire Section has three main concerns with regard to the scheduled June 18, 2002 workshop:

- Scope of Outdoor Lighting Standards Proceeding: The scope of the CEC Outdoor Lighting Standards proceeding to date and for the foreseeable future is too broad to adequately address priority outdoor lighting issues. As you know, the first public workshop was held March 27, and it is my understanding that CEC staff propose to have draft outdoor lighting regulations by July 2002. However, the data developed by CEC staff and contactors is not complete and is insufficient to facilitate a full analysis of the impact of the proposed standards. While NEMA Luminaire Section members have previously raised these issues of concern, they have not been adequately addressed as we approach the upcoming workshop on June 18.

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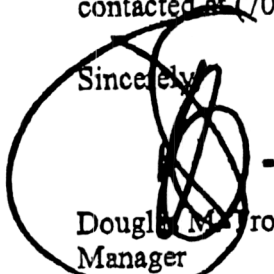
Timeframe of the Outdoor Lighting Standards: The articulated subject areas and goals of the standards proceeding are very aggressive given the complexity of the issues. The contemplation of outdoor lighting standards ranges from potential energy savings in various applications, to the impact of light trespass and personal safety. Considering the extensive work the NEMA Luminaire Section has done on outdoor lighting issues in other states and the amount of time and energy needed to achieve similar goals in these states, the current CEC timeline is ambitious, but realistically unachievable. The industry is very concerned that such a "fast-track" proceeding will restrict opportunities for thoughtful, informed and thorough comment on initial staff/contractor analysis. The open process of research, comment, further analysis and scientifically based conclusions is the tedious but respected work of recognized rulemaking. The NEMA Luminaire Section stands ready to work with you and your staff to develop a brisk but reasonable timeline with focused goals to achieve priority outdoor lighting issues such as energy savings and life safety.

- Adequacy of the Outdoor Lighting Standard Model: The NEMA Luminaire Section members have had productive discussions with CEC staff in this area. However, in order to stand behind the research and workshop findings and recommendations, more detail on the models is required. The cumulative documents, information and models provided by the contractors in the single public workshop leave crucial questions unanswered and simply do not adequately support the recommendations.

The NEMA Luminaire Section will have an industry representative at the June 18 workshop to address these issues for the record. However, we would like to schedule a follow-up meeting with you and your senior staff to discuss these issues in greater detail. The press of the June 18 workshop and the breadth of these matters prevented me from providing a more thorough set of questions for your consideration.

Thank you for your attention to my request and the concerns of the NEMA Luminaire Section. I look forward to meeting to discuss these and other matters of mutual interest, and to future discussions and activities with the California Energy Commission. I may be contacted at (703) 841-3245 or on electronic mail at [dou\\_troutman@nema.org](mailto:dou_troutman@nema.org).

Sincerely,

  
Douglas M. Troutman  
Manager  
Government Affairs